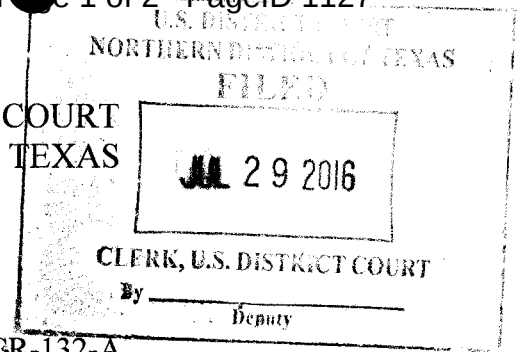


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

§

§

v.

§

No. 4:16-CR-132-A

§

HOLLY LEANNE FRANTZEN (22)

§

FACTUAL RESUME

INDICTMENT: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. § 841(a)(1) and (b)(1)(B))

PENALTY: \$5,000,000 fine – not less than 5 years imprisonment and not more than 40 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 4 years.

MAXIMUM PENALTY: \$5,000,000 fine and not less than five (5) years nor more than forty (40) years imprisonment, plus a term of supervised release of not less than four (4) years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further, the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements, which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Indictment, are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the indictment;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

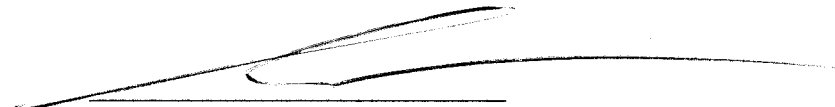
STIPULATED FACTS:

The defendant, Holly Leanne Frantzen, hereby stipulates and agrees that at all times relevant to the indictment herein, the following facts were true:

1. That the defendant, Holly Leanne Frantzen, who is changing her plea to guilty, is the same person charged in the indictment.
2. That the events described in the indictment occurred in the Northern District of Texas.
3. That Holly Leanne Frantzen and one or more persons in some way or manner made an agreement to commit the crime charged in the indictment, to knowingly and intentionally possess with the intent to distribute at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.
4. That Holly Leanne Frantzen knew the unlawful purpose of the agreement and joined in it with the intent to further it.
5. That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

SIGNED this 25th day of July, 2016.


HOLLY LEANNE FRANZTEN
Defendant


MELINDA LEHMANN
Counsel for Defendant